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September 7, 2023

VIA ECF

Hon. Claire C. Cecchi
U.S. District Court, District of New Jersey
MLK Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: DOWC Provider Services, LLC, et al. v. U.S. Auto Sales, Inc., et al.
Civil Action No.: 2:23-cv-03947-CCC-JSA
First Request for Extension of Time to Respond to Plaintiffs' Complaint

Your Honor:

This firm represents Defendants Westlake Services, LLC d/b/a Westlake Financial ("Westlake") and Westlake Portfolio Management ("WPM") (collectively, "Defendants") in the above-referenced action. With the consent of Plaintiffs DOWC Provider Services, LLC, *et al.* ("Plaintiffs"), we write to respectfully request a 21-day extension of time to respond to Plaintiffs' Complaint up to and including October 2, 2023.

Plaintiff filed the Complaint on or about July 24, 2023, in the United States District Court for the District of New Jersey. Following a 14-day clerk's extension, Defendants' deadline to respond to Plaintiffs' Complaint is currently September 11, 2023. A 21-day extension of time will allow for Defendants to properly review the allegations in the Complaint and prepare a response. Accordingly, Defendants request an order extending their response deadline by twenty-one (21) days to October 2, 2023. Defendants have consulted with Plaintiffs' counsel, who consents to the extension being sought.

A proposed Order is attached for your convenience. We thank Your Honor for your consideration of this matter.

Respectfully submitted,

/s/ A. Eli Kaplan
A. Eli Kaplan

cc: All counsel of record (via ECF)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DOWC PROVIDER SERVICES, LLC, <i>et al.</i> , Plaintiffs, v. U.S. AUTO SALES, INC., <i>et al.</i> , Defendants.	Civil Action No.: 2:23-cv-03947-CCC-JSA
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**[PROPOSED] ORDER EXTENDING TIME FOR
DEFENDANTS WESTLAKE SERVICES, LLC d/b/a WESTLAKE
FINANCIAL AND WESTLAKE PORTFOLIO MANAGEMENT
TO RESPOND TO COMPLAINT**

Defendants Westlake Financial Services d/b/a Westlake Financial (“Westlake”) and Westlake Portfolio Management’s (“WPM”) (collectively, “Defendants”) Application for an Extension of Time to answer, move, or otherwise respond to the Complaint is **GRANTED**. Defendants’ time to answer, move, or otherwise respond to the Complaint is extended by twenty-one days up to and including October 2, 2023.

Entered: _____, 2023

Hon. Claire C. Cecchi
United States District Judge